

#### ecology and environment, inc.

111 WEST JACKSON BLVD., CHICAGO, ILLINOIS 60604, TEL. 312-663-9415 International Specialists in the Environment



#### MEMORANDUM

DATE:

December 8, 1986

TO:

File

FROM:

Ruth Ann Jacquette Pag

SUBJECT:

Illinois/F05-8611-124/IL0172

Kankakee/Roper Appliance

ILD180010423

The Roper Corporation, Appliance Division is a former paint and porcelain enamelling facility which operated between 1946 and 1960. Both hazardous and nonhazardous wastes were generated from this process. These substances were disposed in a landfill as well as stored in above ground storage tanks and drums. Production facilities were permanently closed in October 1982, at which time all drums and tanks along with production equipment were shipped off site (see Attachment A). The present activities are limited to an outlet store, a repair parts department and offices.

On August 7, 1980, the Roper Corporation, Appliance Division notified as an generator of hazardous waste. Hazardous waste did not accumulate on the site for more than 90 days. According to the U.S. EPA notification of Hazardous Waste 103(c) dated June 9, 1981, inorganics, solvents, enamel and frit paints were disposed of in a landfill onsite (Attachment B). However, more specific waste type information was not provided.

On April 10, 1984, Ecology and Environment, Inc./FIT conducted a site inspection and interviewed Wendell Provost, Esquire Legal Department, Roper Corporation. During the interview, no records as to waste type or quantity disposed of in the landfill could be provided.

Again, the facility is a generator of both hazardous and nonhazardous waste, but due to the lack of documentation regarding waste type, toxicity, persistence, or quantity, the site will yield an overall Hazardous Ranking Score of zero.

48W:4M

February 23, 1984

Mr. Kenneth P. Beachely Northern Region Manager Field Operations Section Division of Land Pollution Control 1701 South First Avenue - Suite 600 Maywood, Illinois 60153

RE: LO9100000 - Kankakee County - Kankakee/Roper
Appliance
IL180010423

Dear Mr. Beachely:

This will serve as Roper Corporation's response to your letter of January 26, 1984 regarding claimed violations of the Illinois Environmental Protection Act (the "Act") by Roper relating to its Appliance Facility located at 2207 W. Station Street, Kankakee, Illinois.

Roper discontinued its manufacturing operations at its Appliance Facility in October 1982. All production equipment was transferred to other manufacturing groups within the Corporation. Presently, the activity at the facility is limited to an outlet store, a repair parts department and offices for some of the Company's Appliance Group and Outdoor Power Equipment Group personnel.

The majority of the claimed violations in your letter deal with interim status regulations for owners and operators of treatment, storage and disposal facilities for hazardous waste. Roper did not file for a permit to qualify for this status as it did not believe it came within this category. While in operation, the Roper Appliance facility held a Generator permit since it did not intend to accumulate hazardous waste for more than 90 days.

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Appliance
IL180010423

As a generator, Roper made every effort to comply with all regulations of the Act for generators of hazardous waste. During the closure of the facility, Roper determined that various quantities and types of waste were still located on the premises. This was confirmed by Mr. Jim Wiggins of your office during an on-site inspection on August 23, 1983. At the time of this inspection, the Company had already taken steps to inventory and remove all of the material pursuant to the disposal permits issued to the Company by the State of Illinois. Roper believed that the majority of the material was non-hazardous and subject to recycling or reuse.

Although Roper did not have a formal written closure plan, the steps taken to completely close the Kankakee Appliance facility included the following:

- 1. Clean-up and remove production equipment to other Company facilities. Although production was discontinued in October 1982, transferring of both equipment and production took some time.
- 2. Kankakee Industrial Disposal (KID) was contacted in July 1983 to begin an inventory of all waste located at the plant and review permits necessary for the removal of the waste.
- 3. During the week of September 6, 1983, the waste on hand at the facility was further identified and described by KID. The waste was identified as follows:
- Category No. 1 61 drums of non-hazardous dry paint chips residue,

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- Category No. 2 36 drums of non-hazardous waste water sludge,
- Category No. 3 18 drums of hazardous and flammable drip room residue,
- Category No. 4 59 drums of hazardous and flammable waste thinner and paint, and
- Category No. 5 29 drums of unknown material.

There were also 55 5-gallon cans of paint and coating in the yard and 84 drums of virgin paint (also Category No. 4) located in the plant.

Of this inventory, 38 drums from Category No. 1 was removed to Chicago CID, site No. 2 under our Permit No. 810371. This material was removed from our premises on September 13, 1983.

4. On September 14, 1983, a box load of waste from Category No. 2 was removed to Chicago CID site No. 2 under our Permit No. 810372.

Also, on this same date 110 drums were pumped, cut and scrapped. The material from these drums was snipped to American Chemical Company in Griffith, Indiana on September 16, 1983. A permit for this out-of-state shipment was not necessary.

An additional barrel was located and identified as Category No. 1 waste. Also, 17 additional drums were identified as Category No. 2 waste.

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The remaining barrels, pails and cans were moved from the paint room to the rear of the building for handling. The paint room and equipment were cleaned and the area secured for the weekend.

5. On September 19, 1983, a number of quart, gallon and 5-gallon cans of paint were dumped into two drums for pumping. A total of 57 drums (2700 gallons) from Category No. 4 were pumped and shipped to American Chemical Co. on September 23, 1983. All empty drums were cut, smashed and placed in an iron box.

At the conclusion of this week, there remained 127 drums in the yard, 11 of which were oil and water waste.

6. For the week ending September 30, 1983, the yard area along the fence had been cleaned of all barrels and debris and had been scraped down and leveled. All flammable drums had been moved across the driveway awaiting renewal of the appropriate permit.

J & B Oil Company was called in to pump all waste oil and water. There were 13 drums of this material.

There were 42 empty paint drums returned to Rockford Coating Corp. for reconditioning.

Acme Barrel was called in to examine the remaining empty paint drums.

7. All remaining paint drums were moved into an open area for the pumping of bottoms of these drums during the week of October 3, 1983.

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During a tour of the inside of the plant, l drum and 8 5-gallon cans of waste oil from presses were located and moved outside for pumping. Additionally, l partial carboy of phosphoric acid was located and moved outside for handling.

The area was again cleaned up and secured for the weekend.

8. The balance of the plant was toured during the week of October 10, 1983.

J & B Oil pumped and removed 800 gallons of used oil.

The remaining paint and thinner drums were pumped and this waste, 2000 gallons, was transported to American Chemical Co. on October 10, 1983.

An inventory of the chemicals in the plant lab was conducted and 9 drums of chemicals were located. There were 2 drums of bondrite 60, 2 of muriatic acid, 3 of nickel chloride, 2 phosphoric acid and 2 of caustic beads identified. The muriatic acid and caustic beads was removed by Kankakee Plating Co.

The 39 drums (Category Nos. 2 and 3) awaiting permit were placed on a trailer and shipped to Chemical Waste Management, Inc. The remaining bad drums were cleaned, cut and mashed for iron salvage.

After Acme Barrel picked up 174 drums for reconditioning, 135 drums still remained as of October 14, 1983.

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IL180010423

- 9. Acme returned on October 18, 1983 and picked up an additional 100 drums for reconditioning. The balance of the drums were cleaned, cut and mashed for iron salvage.
- 10. With the exception of 5 drums of bondrite, 7 square boxes of nickel compound and 4 drums of lab chemicals, all waste had been removed by October 31, 1983. The bondrite and nickel compound may be usable at one of our facilities. We will determine this in the immediate future and advise your office how this material will be handled. The lab chemicals should be removed to Chemical Waste Management, Inc., Emelle, Alabama, by March 9, 1984.
- 11. Pursuant to regulations, Kankakee Industrial Disposal (KID) took pH samples of the soil. These tests indicated soil conditions to be within normal specifications. I will forward to you evidence of this testing in the immediate future.

Since all manufacturing operations at this facility have been discontinued, there is no chance of any reoccurrence of any of the claimed violations cited. I have enclosed for your file copies of the appropriate documents which substantiate the closure activity described above.

Roper's policy is to comply fully with all applicable state and federal laws and regulations. This includes the directives of the Agency.

Please type or print in ink. If you need .'his initial notification information is ATTACHMENT В additional space, use separate sheets of required by Section 103(c) of the Comprehensive Environmental Response, Compenpaper. Indicate the letter of the item sation, and Liability Act of 1980 and must which applies. be mailed by June 9, 1981. 11 # 480 165-000-001-487 Person Required to Notify: Roper Corporation Name Enter the name and address of the person or organization required to notify. 1905 West Court Street Street Kankakee IL 60901 Zip Code State City Site Location: Roper Corporation - Appliance Division Name of Site Enter the common name (if known) and actual location of the site. 2207 West Station Street Street 1LT 180010423 Kankakee Kankakee 60901 State Zip Code City Person to Contact: Name (Last, First and Title) Hertz, James G., Assistant General Attorney Enter the name, title (if applicable), and business telephone number of the person (815)937-6111 Phone to contact regarding information submitted on this form. **Dates of Waste Handling:** Enter the years that you estimate waste From (Year) Before 1946 To (Year) Approximately 1960 treatment, storage, or disposal began and ended at the site. Waste Type: Choose the option you prefer to complete Option I: Select general waste types and source categories. If Option 2: This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 you do not know the general waste types or sources, you are encouraged to describe the site in Item I—Description of Site. regulations (40 CFR Part 261). General Type of Waste: Source of Waste: Specific Type of Waste: EPA has assigned a four-digit number to each hazardous waste Place an X in the appropriate Place an X in the appropriate listed in the regulations under Section 3001 of RCRA. Enter the boxes. The categories listed boxes. overlap. Check each applicable appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by category. contacting the EPA Region serving the State in which the site is located. Organics 1. 
Mining 2. X Inorganics 2. 

Construction 3. X Solvents 3. Textiles 4. 

Pesticides 4. 
Fertilizer 5. 

Heavy metals 5. 

Paper/Printing 6. Acids 6. 

Leather Tanning 7. 
Bases 7. Iron/Steel Foundry 8. 
PCBs 8. 

Chemical, General 9. Mixed Municipal Waste 9. 
Plating/Polishing 10. Unknown 10. ☐ Military/Ammunition 11. S Other (Specify) 11. 

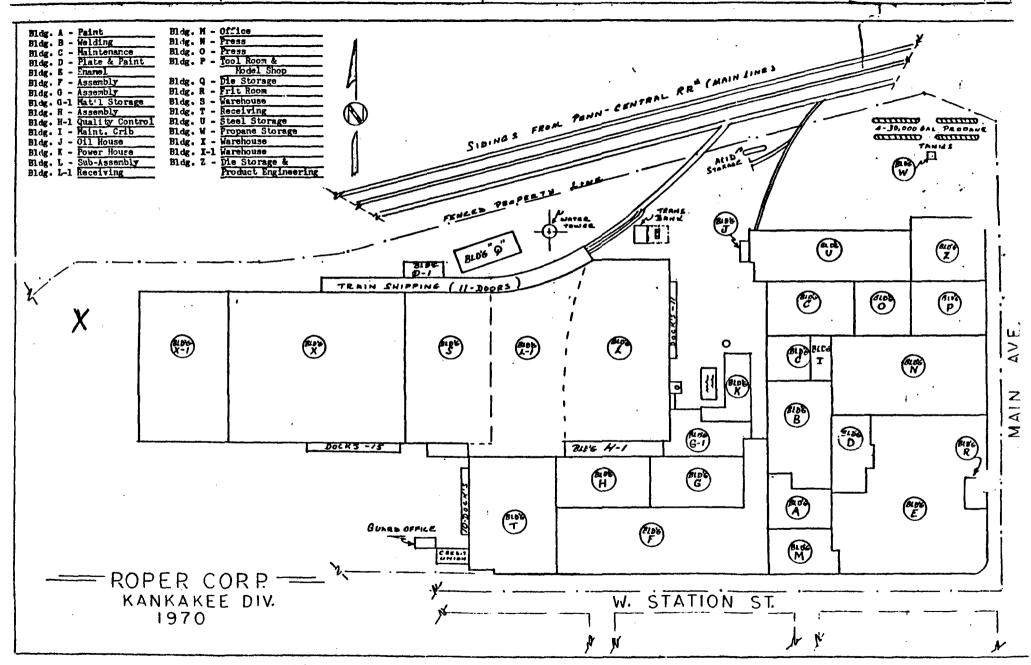
Electrical Conductors enamel, frit paint 12. 
Transformers 13. Utility Companies 14. ☐ Sanitary/Refuse 000033 JUN 1181 15. Photofinish 16. ☐ Lab/Hospital 17. 
Unknown 18. C Other (Specify) porcelain enamelling

facility, paint facilities

Form Approved OMB No. 2000-0138 EPA Form 8900-1

	Control Mazardous waste site	Side (WO							
F	Waste Quantity:	Facility Type	Total Facility Was	te Amount					
•••	Place an X in the appropriate boxes to	1. 🗆 Piles	cubic feet 150,000	, C					
	In the "total facility waste amount" space give the estimated combined quantity volume) of hazardous wastes at the site using cubic feet or gallons.  In the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.	2. 🗆 Land Treatment							
		3. ☑ Landfill 4. □ Tanks		gallons					
		5. Impoundment	Total Facility Area						
		6. D Underground Injection	square feet (100°)	x 150') 15,000 £					
		7. Drums, Above Ground	acres						
		8. ☐ Drums, Below Ground 9. ☐ Other (Specify)							
G	Known, Suspected or Likely Releases to the Environment:								
	Place an X in the appropriate boxes to indicate any known, suspected, Suspected Likely & Nor or likely releases of wastes to the environment.								
	Note: Items Hand I are optional. Completing these items will assist EPA and State and local governments in locating and assessing nazardous waste sites. Although completing the items is not required, you are encouraged to do so.								
н	Sketch Map of Site Location: (Optional)								
	Sketch a map showing streets, highways, routes or other prominent landmarks near the site. Place an X on the map to indicate the site location. Draw an arrow showing	See Attached Sheet .							
	the direction north. You may substitute a publishing map showing the site location.								
				•					
				-·					
i	Description of Site: (Optional)	•							
	Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.								
-	· ·								
ز	Signature and Title:								
	The person or authorized representative such as plant managers, superintendents, inustees or attorneys) of persons required is notify must sign the form and provide a mailing address (if different than address nitem A). For other persons providing notification, the signature is optional. Speck the boxes which best describe the feationship to the site of the person required to notify. If you are not required to notify check "Other".	Name Roper Corporation	Owner, Present						
		Street 1905 West Court Street		<ul> <li>Owner, Past</li> <li>Transporter</li> <li>Operator, Present</li> <li>Operator, Past</li> </ul>					
		City Kankakee Stat	IL Zip Code 60901						
		Signature Allers Coffeety	Date 6/9/81	☐ Other -					

EPA ID# ILT180010423												
SITE NAME Roper Corp Appliance Dis.												
NORLING FACTOR	16		_( > 15 P	TS.≈HIGH 1	MITRE PO	OTENTIAL)						
WASTE TYPE			CUANTIT		_			_				
PESTICIDES	(5)	(1 to	n = ½ cu	.yd.=13.5	cu.ft.	=4 drums =	220	gals.)				
HEAVY METALS	(5)	TONS	CU.YDS.	CU. FT.	DRUMS	GALLONS	PTS.	]				
PCB's	(5)	>875	>437		>3500	>192,500	(5)	ا [				
ORGANICS	(4)	875	437	11,799	3500	192,500						
SOLVENTS .	(4)	251	126	3,402	1001	55,055	(4)	4				
INORGANICS	(3)	250	125	3,375	1000	55,000		1				
ACIDS	(3)	163	82	2,214	651	35,805	(3)	4				
BASES MIXED MUNI-WASTES	(3)	162	81 38	2,187	650	35,750 16,555	(2)	ļ				
UNKNOWN	(2) (1)	75	37	1,026 999	300	16,500	1-(2)	1				
Chickon	(1)	21	11	297	81	4,455	(1)					
		<20	<10	<270	<80	<4,400	(0)	1				
POPULATION  PILES  DRUMS BELOW GROUND (4)  DRUMS ABOVE GROUND (3)  SURFACE IMPOUNDMENTS (3)  TANKS  (3)  LANDFILLS  LAND TREATMENT  (2)  UNDERGROUND (1)  POPULATION  10,000 or more (5)  3,000 - 9,999 (4)  1,000 - 2,999 (3)  101 - 999 (2)  1 - 100 (1)												
NOT A HAZARDOUS WASTE SITE INFORMATION MISSING COMMENTS:												
REVIEWER: MAD	(	<u>).</u>										





1905 WEST COURT STREET P.O. 80X 867 KANKAKEE, ILLINOIS 60901 TELEPHONE (815) 937-6000

June 12, 1981

United States Environmental Protection Agency Washington, DC 20460

Dear Sirs:

Enclosed please find a corrected copy of Roper Corporation's Appliance Division Notification of Hazardous Waste Site. Please note that in Section F the total square feet is 15,000, not 15,000 acres as indicated on the previously filed form.

Very truly yours,

Zames G. Hertz

Assistant General Attorney

JGH: kjm

enc.